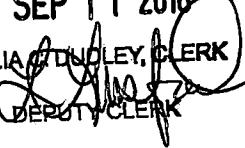


SEP 11 2018

JULIA STODDLEY, CLERK
BY: 
DEPUTY CLERK

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
ABINGDON DIVISION

UNITED STATES OF AMERICA

v.

SHADE CARLTON WORKMAN

:
:
: Case No. 1:18CR20
:
: Violations: 18 U.S.C. § 1001
:

INDICTMENT

COUNT ONE

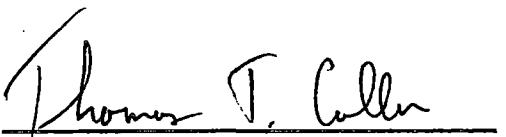
The Grand Jury charges that:

1. On or about August 13, 2018, in the Western District of Virginia and elsewhere, SHADE CARLTON WORKMAN, in a matter within the jurisdiction of the executive branch of the Government of the United States, knowingly and willfully made materially false, fictitious, and fraudulent statements and representations.
2. On or about August 13, 2018, SHADE CARLTON WORKMAN was interviewed by Special Agents of the Federal Bureau of Investigation regarding allegations of civil rights violations and whether or not he had (1) engaged in sexual activity with a confidential informant while employed as a Special Agent with the Virginia State Police, and (2) directed a confidential informant to destroy evidence of an illicit sexual relationship between him and the confidential informant. SHADE CARLTON WORKMAN denied that he had engaged in the alleged activity.
3. At the time of the interview, SHADE CARLTON WORKMAN knew that in fact he had (1) engaged in sexual activity with a confidential informant while employed as a Special Agent with the Virginia State Police, and (2) directed a confidential informant to destroy evidence of an illicit sexual relationship between him and the confidential informant.

4. The Federal Bureau of Investigation is an agency of the executive branch of the Government of the United States.

5. All in violation of Title 18, United States Code, Section 1001(a)(2).

A TRUE BILL, this 11 day of September, 2018.


s/Grand Jury Foreperson


THOMAS T. CULLEN
United States Attorney